

**REMARKS**

The Examiner is thanked for the careful review of the application as set forth in the outstanding office action. Reconsideration of the application in view of the foregoing amendments and the following discussion is respectfully requested.

**Claims Rejections - 35 USC 102**

Claims 1-3, 9, 10, 11, 13, 21-22, 24-32, 34, 37-42 stand rejected as being anticipated by Cline et al. ("Cline"). The rejection is respectfully traversed, on the grounds that a prima facie case of anticipation has not been established, and the reference does not describe each limitation of the rejected claims.

Cline does not describe the following exemplary limitations of rejected claims:

a line voltage connector structure non-removably mounted on the circuit board, said connector structure having a set of line voltage connectors, each line voltage connector including a connector for connection of a corresponding set of line voltage service conductors and a connector line voltage conductor pin soldered to one of said circuit board line voltage contact surfaces **[Claim 1]**

a voltage transformer mounted on the printed circuit board for transforming line voltage to low voltage **[Claim 8]**

controller printed circuit board includes an isolated circuit board line voltage contact surface, and first and second wire connectors, said first wire connector electrically connected to a first one of said line voltage service conductors, said second wire connector electrically connected to a second one of said line voltage conductors, said system further comprising a jumper wire connectable between said first wire connector or said second wire connector **[Claim 21]**

a line voltage connector structure non-removably mounted on the circuit board, said connector structure having a set of line voltage connectors, each line voltage connector including a connector for connection of a corresponding set of line voltage service conductors and a connector line voltage conductor pin soldered to a board line voltage contact surface **[Claim 22]**

a voltage transformer for transforming the line voltage to low voltage levels mounted on the circuit board **[Claim 24]**

a voltage transformer mounted on the printed circuit board for transforming line voltage to low voltage **[Claim 29]**

said wall clamping surface is defined along a top edge of said wall **[Claim 37]**

said clamp member is mounted for hinged movement between an open position and said clamping position **[Claim 38]**

said wall clamping surface comprises a series of channels formed in said top edge to receive wiring conductors, and said clamp member has a series of relieved areas formed along a longitudinal clamp member edge in correspondence with said series of channels **[Claim 39]**

each of said series of channels formed in said top edge are sized for a given wiring conductor diameter **[Claim 40]**

said series of channels are of a plurality of widths to accommodate wiring conductors of different diameters **[Claim 41]**

said controller printed circuit board includes an isolated circuit board line voltage contact surface, and first and second wire connectors, said first wire connector electrically connected to a first one of said line voltage service conductors, said second wire connector electrically connected to a second one of said line voltage conductors, said system further comprising a jumper wire connectable between said first wire connector or said second wire connector **[Claim 42]**

Regarding the above-quoted limitation of Claim 1, Cline describes a terminal block 240 which is removably attached to the circuit board 250 by fasteners 251, which "facilitates the installation and removal of the board 250 relative to the cabinet." (See, Cline at FIGS. 9, 11; 9:18-25; 7:34-45). Cline therefore cannot anticipate the subject matter of Claim 1, as well as all claims depending from Claim 1.

Regarding the above-quoted limitations of Claims 8, 21, 24 and 29, while Cline describes a voltage transformer, the reference does not describe that such a transformer is mounted on the circuit board.

Regarding the above-quoted limitations of Claim 21 and 42, the office action does not address these limitations, e.g. the jumper wire, and so a prima facie case of anticipation has not been established for the subject matter added by Claim 21.

Regarding the above-quoted limitations of Claims 37-41, the office action does not address these limitations, and so a prima facie case of anticipation has not been established for these claims. Moreover, these claims depend directly or indirectly from Claim 36, which is not rejected under Section 102, but instead under Section 103, providing another reason for withdrawing the rejection of Claims 37-41. If Claim 36 is not anticipated, then claims depending from Claim 36 cannot be anticipated.

Because Cline does not describe each element of the rejected claims, the rejection under Section 102 should be withdrawn.

#### Claims Rejections - 35 USC 103

Claims 2, 12, 14-20, 23, 33, 34, 36 stand rejected as being unpatentable over Cline in view of Davis et al. ("Davis"). The rejection is respectfully traversed, on the grounds that a prima facie case of obviousness has not been established, and the references do not teach or suggest the claimed subject matter.

The Examiner alleges that Davis is applied for teaching strain relief structure 10 as effective and leading to a safer operating device. The Examiner further alleges that in view of this teaching, it would have been obvious to modify the Cline system "to also use strain relief structure, to enhance the safety of the device. Use of particular types of strain relief structures as set forth in claims 15-20 is considered an obvious choice for the artisan, since many different schemes are conventionally used and such choice is dependent on the end use of the device, the size and level of safety designated by the users." Applicant respectfully disagrees, and contends that there is no teaching or motivation to modify Cline to arrive at the claimed subject matter.

Davis states that "power cord 11 is installed through strain relief 10," but otherwise does not describe the structure of element 10. Davis does not disclose that the power cord 11 is connected to line voltage, or that the cord set includes line voltage conductors. Davis teaches away from use of line voltage conductors for connections from line voltage load connectors to line voltage loads, since Davis is concerned with a remote control unit which uses air transmitters to actuate air switches remotely located from the control unit, and so to avoid placing line voltage conductors and switches within his remote control unit. See, e.g., 3:47-52: "Interchangeable remote actuator means and preferably air transmitters 3 are installed in the face plate of the control unit according to the present invention, and are connected to remote air switches to operate the various spa equipment, i.e. blowers, pumps, heaters, spa lights and other

associated equipment.” Thus, the cord set 11 includes air lines which connect to the transmitters, e.g. at 25 for transmitter 3, as illustrated in FIG. 5 of Davis.

Thus, Davis does not teach or suggest the following limitations:

a plurality of sets of line voltage conductors for connections from the line voltage load connectors to the respective plurality of line voltage loads; and

a strain relief clamp structure integrated with the housing structure for clamping the plurality of sets of line voltage conductors in place

**[Claims 2, 23]**

With respect to Claims 15-20, the allegations regarding obvious choice for the artisan are respectfully traversed. No support other than alleged common knowledge and “obvious choice” are given for rejection of these claims. Applicant traverses the allegations, and assert that the subject matter of these claims provides advantages not heretofore recognized, including those recited in the specification at paragraph 26. Moreover, the failure to support this statement was error. See, e.g. *In re Zurko*, 59 USPQ 1693, 1697 (Fed. Cir. 2001); MPEP 2144.04 (A) (B) (C), establishing that it is not appropriate for the examiner to take official notice of facts without citing a prior art reference, where the facts asserted to be well known are not capable of instant and unquestionable demonstration as being well-known, and that a holding that general conclusions concerning what is “basic knowledge” or “common sense” to one of ordinary skill in the art without specific factual findings and some concrete evidence in the record to support these findings will not support an obviousness rejection.

Similar considerations apply to Claim 36.

In the event the rejection is maintained, applicant respectfully requests that the Examiner supply a prior art reference or, if the allegations are based on the personal knowledge of the Examiner, an affidavit, supporting the rejection.

The features of Claims 14 and 35 are not addressed in this ground of rejection, and for that reason alone, a prima facie case of obviousness has not been established.

In view of the foregoing, a prima facie case of obviousness has not been established, and the applied references do not teach or suggest the claimed invention. Withdrawal of the rejection under Section 103 is respectfully requested.

### CONCLUSION

The outstanding rejections have been addressed, and the application is in condition for allowance. Such favorable reconsideration is solicited.

Respectfully submitted,



Larry K. Roberts  
Registration No. 28,464

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Law Offices of Larry K. Roberts, Inc.  
P.O. Box 8569  
Newport Beach, CA 92658-8569  
Telephone (949) 640-6200  
Facsimile (949) 640-1206